PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Flint Ink North America Corporation
3025 West Old Road 30
Warsaw, IN 46580-0287

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T085-7115-00037	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality *Original signed by Janet McCabe*	Issuance Date: June 8, 2001 Expiration Date: June 8, 2006

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary printing ink production plant.

Responsible Official:	Duane Ness
Source Address:	3025 West Old Road 30, Warsaw, IN, 46580-0287
Mailing Address:	P.O. BOX 287, Warsaw, IN, 46580-0287
Phone Number:	219-269-4603
SIC Code:	2893
County Location:	Kosciusko
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) one (1) ink and concentrate mixing area, installed in 1981, exhausting to the interior of the building, and consisting of:
  (1) two (2) V series beveled bottom fixed roof dome tanks, identified as V100-V101, each with a maximum capacity of 4,000 gallons of clear ink and concentrate;
  (2) two (2) V series beveled bottom fixed roof dome tanks, identified as V102-V103, each with a maximum capacity of 4,000 gallons of yellow ink and concentrate;
  (3) one (1) V series beveled bottom fixed roof dome tank, identified as V104, with a maximum capacity of 4,000 gallons of red ink and concentrate;
  (4) one (1) V series beveled bottom fixed roof dome tank, identified as V105, with a maximum capacity of 4,000 gallons of blue ink and concentrate;
  (5) one (1) V series beveled bottom fixed roof dome tank, identified as V106, with a maximum capacity of 2,200 gallons of blue ink and concentrate;
  (6) one (1) Ink Loading (Finished Ink) operation, exhausting to the atmosphere
  (7) one (1) Ink Loading (Resinate) operation, exhausting to the atmosphere,
  (8) one (1) Ink Loading, In (Toluene) operation, exhausting to the atmosphere,
  (9) one (1) Ink Loading, Out (Toluene) operation, exhausting to the atmosphere
  (10) three (3) V series fixed roof dome tanks, identified as PM101 through PM103, each with a maximum capacity of 375 gallons of custom inks and concentrate.

(b) one (1) exterior raw material storage area, installed in 1981, exhausting to the atmosphere and consisting of:
  (1) three (3) V series fixed roof dome tanks, identified as V502 through V504, each with a maximum capacity of 17,000 gallons of toluene; and
  (2) two (2) V series fixed roof dome tanks, identified as V505 and V506, each with a maximum capacity of 30,000 gallons of resinate.

(c) one (1) concentrate surge area, installed in 1981, exhausting to the atmosphere and consisting of:
  (1) three (3) V series fixed roof dome tanks, identified as V151, V160 and V161, each with a maximum capacity of 500 gallons of concentrate;

(d) one (1) intermediate storage area, installed in 1981, exhausting to the atmosphere and consisting of:
  (1) six (6) V series fixed roof dome tanks, identified as V203, V204, V205, V207, V400, and V403 each with a maximum capacity of 10,000 gallons of concentrate;
  (2) two (2) V series fixed roof dome tanks, identified as V208 and V213, each with a maximum capacity of 6,200 gallons of concentrate; and

(e) one (1) finished ink storage area, installed in 1981, exhausting to the atmosphere and consisting of:
  (1) six (6) V series cone bottom fixed roof dome tanks, identified as V401, V402, V404 through V407, each with a maximum capacity of 10,000 gallons of ink.

(f) Loading racks for loading finished product and solvents, with a maximum capacity of 12,000 gallons per hour; and

(g) Building vents (CEF-1 and CEF-2) and dust collector exhaust (F-701) venting indoor VOCs from piping losses and mixing tank losses to the atmosphere.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Activities or categories not previously identified with emissions less than or equal to insignificant thresholds:
  (1) Handling of pigments, waxes, clays and other dry materials, using a baghouse as particulate control (maximum process weight rate of 14 tons per hour of dry materials). [326 IAC 6-3-2]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM , the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee’s control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee’s failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy any records that must be kept under the conditions of this permit;

(c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP);

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) Unless otherwise specified in this permit, any Semi-Annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(a) one (1) ink and concentrate mixing area, installed in 1981, exhausting to the interior of the building, and consisting of:
  (1) two (2) V series beveled bottom fixed roof dome tanks, identified as V100-V101, each with a maximum capacity of 4,000 gallons of clear ink and concentrate;
  (2) two (2) V series beveled bottom fixed roof dome tanks, identified as V102-V103, each with a maximum capacity of 4,000 gallons of yellow ink and concentrate;
  (3) one (1) V series beveled bottom fixed roof dome tank, identified as V104, with a maximum capacity of 4,000 gallons of red ink and concentrate;
  (4) one (1) V series beveled bottom fixed roof dome tank, identified as V105, with a maximum capacity of 4,000 gallons of blue ink and concentrate;
  (5) one (1) V series beveled bottom fixed roof dome tank, identified as V106, with a maximum capacity of 2,200 gallons of blue ink and concentrate;
  (6) one (1) Ink Loading (Finished Ink) operation, exhausting to the atmosphere
  (7) one (1) Ink Loading (Resinate) operation, exhausting to the atmosphere,
  (8) one (1) Ink Loading, In (Toluene) operation, exhausting to the atmosphere,
  (9) one (1) Ink Loading, Out (Toluene) operation, exhausting to the atmosphere
  (10) three (3) V series fixed roof dome tanks, identified as PM101 through PM103, each with a maximum capacity of 375 gallons of custom inks and concentrate.

(b) one (1) exterior raw material storage area, installed in 1981, exhausting to the atmosphere and consisting of:
  (1) three (3) V series fixed roof dome tanks, identified as V502 through V504, each with a maximum capacity of 17,000 gallons of toluene; and
  (2) two (2) V series fixed roof dome tanks, identified as V505 and V506, each with a maximum capacity of 30,000 gallons of resinate.

(c) one (1) concentrate surge area, installed in 1981, exhausting to the atmosphere and consisting of:
  (1) three (3) V series fixed roof dome tanks, identified as V151, V160 and V161, each with a maximum capacity of 500 gallons of concentrate;

(d) one (1) intermediate storage area, installed in 1981, exhausting to the atmosphere and consisting of:
  (1) six (6) V series fixed roof dome tanks, identified as V203, V204, V205, V207, V400, and V403 each with a maximum capacity of 10,000 gallons of concentrate;
  (2) two (2) V series fixed roof dome tanks, identified as V208 and V213, each with a maximum capacity of 6,200 gallons of concentrate; and

(e) one (1) finished ink storage area, installed in 1981, exhausting to the atmosphere and consisting of:
  (1) six (6) V series cone bottom fixed roof dome tanks, identified as V401, V402, V404 through V407, each with a maximum capacity of 10,000 gallons of ink.

(f) Loading racks for loading finished product and solvents, with a maximum capacity of 12,000 gallons per hour; and

(g) Building vents (CEF-1 and CEF-2) and dust collector exhaust (F-701) venting indoor VOCs from piping losses and mixing tank losses to the atmosphere.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 General Volatile Organic Compound Reduction Requirements [326 IAC 8-1-6]

(a) The total amount of product input to the clear ink and concentrate tanks (V100-V101) shall be limited to 37,000 tons per twelve (12) consecutive months such that the potential to emit (PTE) VOC from the manufacture of clear ink and concentrate, shall be limited to less than 25 tons per twelve (12) consecutive months. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per twelve (12) consecutive month period.

(b) The total amount of product input to the yellow ink and concentrate tanks (V102-V103) shall be limited to 37,000 tons per twelve (12) consecutive months such that the potential to emit (PTE) VOC from the manufacture of yellow ink and concentrate, shall be limited to less than 25 tons per twelve (12) consecutive months. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per twelve (12) consecutive month period.

(c) The total amount of product input to the red ink and concentrate tank (V104) shall be limited to 37,000 tons per twelve (12) consecutive months such that the potential to emit (PTE) VOC from the manufacture of red ink and concentrate, shall be limited to less than 25 tons per twelve (12) consecutive months. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per twelve (12) consecutive month period.

(d) The total amount of product input to the blue ink and concentrate tanks (V105-V106) shall be limited to 37,000 tons per twelve (12) consecutive months such that the potential to emit (PTE) VOC from the manufacture of blue ink and concentrate, shall be limited to less than 25 tons per twelve (12) consecutive months. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per twelve (12) consecutive month period.

The usage limit for tanks V100 through V106 shall be based upon the following:

(1) (total amount of product input) x (emission factor in pounds VOC per pound of product manufactured) = (potential to emit (PTE) VOC)
(2) an emission factor of 0.00066 pounds VOC per pound of product manufactured;
(3) any other factor determined in a stack test approved by OAQ.

Compliance with these limits makes 326 IAC 8-1-6 not applicable.

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this permit, in order to verify the emission factor used to determine the production limit in Condition D.1.1, the Permittee shall perform VOC testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.4 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(1) Records of production for each month;

(2) The emission factor used for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
(a) Activities or categories not previously identified with emissions less than or equal to insignificant thresholds
(1) Handling of pigments, waxes, clays and other dry materials, using a baghouse as particulate control (maximum process weight rate of 14 tons per hour of dry materials). [326 IAC 6-3-2]
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the handling of pigments, waxes, clays and other dry materials shall not exceed 24.0 pounds per hour.

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.2 Particulate Matter (PM)

In order to comply with D.2.1, the baghouse for PM control shall be in operation and control emissions from the Handling of pigments, waxes, clays and other dry materials at all times that the Handling of pigments, waxes, clays and other dry materials are in operation.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.4 Visible Emissions Notations

(a) Daily visible emission notations of the handling of pigments, waxes, clays and other dry materials baghouse stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.2.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the handling of pigments, waxes, clays and other dry materials, at least once once per shift when the handling of pigments, waxes, clays and other dry materials is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.6 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements

(a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the handling of pigments, waxes, clays and other dry

materials baghouse stack exhaust.

(b) To document compliance with Condition D.2.5, the Permittee shall maintain the following:

(1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle operation.

(2) Documentation of the dates vents are redirected.

(b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 and the dates the vents are redirected.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Flint Ink North America Corporation
Source Address: 3025 West Old Road 30, Warsaw, IN, 46580-0287
Mailing Address: P.O. Box 287, Warsaw, IN, 46580-0287
Part 70 Permit No.: T085-7115-00037

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Flint Ink North America Corporation
Source Address: 3025 West Old Road 30, Warsaw, IN, 46580-0287
Mailing Address: P.O. Box 287, Warsaw, IN, 46580-0287
Part 70 Permit No.: T085-7115-00037

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Flint Ink North America Corporation
Source Address: 3025 West Old Road 30, Warsaw, IN, 46580-0287
Mailing Address: P.O. Box 287, Warsaw, IN, 46580-0287
Part 70 Permit No.: T085-7115-00037
Facility: clear ink and concentrate tanks (V100-V101)
Parameter: VOC input
Limit: The total amount of product input to the clear ink and concentrate tanks (V100-V101) shall be limited to 37,000 tons per twelve (12) consecutive months such that the potential to emit (PTE) VOC from the manufacture of clear ink and concentrate, shall be limited to less than 25 tons per twelve (12) consecutive months. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per twelve (12) consecutive month period.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Flint Ink North America Corporation
Source Address: 3025 West Old Road 30, Warsaw, IN, 46580-0287
Mailing Address: P.O. Box 287, Warsaw, IN, 46580-0287
Part 70 Permit No.: T085-7115-00037
Facility: yellow ink and concentrate tanks (V102-V103)
Parameter: VOC input
Limit: The total amount of product input to the yellow ink and concentrate tanks (V102-V103) shall be limited to 37,000 tons per twelve (12) consecutive months such that the potential to emit (PTE) VOC from the manufacture of yellow ink and concentrate, shall be limited to less than 25 tons per twelve (12) consecutive months. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per twelve (12) consecutive month period.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Flint Ink North America Corporation
Source Address: 3025 West Old Road 30, Warsaw, IN, 46580-0287
Mailing Address: P.O. Box 287, Warsaw, IN, 46580-0287
Part 70 Permit No.: T085-7115-00037
Facility: red ink and concentrate tank (V104)
Parameter: VOC input
Limit: The total amount of product input to the red ink and concentrate tank (V104) shall be limited to 37,000 tons per twelve (12) consecutive months such that the potential to emit (PTE) VOC from the manufacture of red ink and concentrate, shall be limited to less than 25 tons per twelve (12) consecutive months. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per twelve (12) consecutive month period.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Flint Ink North America Corporation
Source Address: 3025 West Old Road 30, Warsaw, IN, 46580-0287
Mailing Address: P.O. Box 287, Warsaw, IN, 46580-0287
Part 70 Permit No.: T085-7115-00037
Facility: blue ink and concentrate tanks (V105-V106)
Parameter: VOC input
Limit: The total amount of product input to the blue ink and concentrate tanks (V105-V106) shall be limited to 37,000 tons per twelve (12) consecutive months such that the potential to emit (PTE) VOC from the manufacture of blue ink and concentrate, shall be limited to less than 25 tons per twelve (12) consecutive months. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per twelve (12) consecutive month period.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Flint Ink North America Corporation
Source Address: 3025 West Old Road 30, Warsaw, IN, 46580-0287
Mailing Address: P.O. Box 287, Warsaw, IN, 46580-0287
Part 70 Permit No.: T085-7115-00037

Months:_____ to_____ Year:_____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Page 2 of 2

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: ______________________________

Title/Position: ______________________________

Date: ______________________________

Phone: ______________________________

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	Flint Ink North America Corporation
Source Location:	3025 West Old Road 30, Warsaw, IN, 46580-0287
County:	Kosciusko
SIC Code:	2893
Operation Permit No.:	T085-7115-00037
Permit Reviewer:	Phillip Ritz/EVP

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Flint Ink North America Corporation relating to the operation of a printing ink production plant.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) one (1) ink and concentrate mixing area, installed in 1981, exhausting to the interior of the building, and consisting of:
  (1) two (2) V series beveled bottom fixed roof dome tanks, identified as V100-V101, each with a maximum capacity of 4,000 gallons of clear ink and concentrate;
  (2) two (2) V series beveled bottom fixed roof dome tanks, identified as V102-V103, each with a maximum capacity of 4,000 gallons of yellow ink and concentrate;
  (3) one (1) V series beveled bottom fixed roof dome tank, identified as V104, with a maximum capacity of 4,000 gallons of red ink and concentrate;
  (4) one (1) V series beveled bottom fixed roof dome tank, identified as V105, with a maximum capacity of 4,000 gallons of blue ink and concentrate;
  (5) one (1) V series beveled bottom fixed roof dome tank, identified as V106, with a maximum capacity of 2,200 gallons of blue ink and concentrate;
  (6) one (1) Ink Loading (Finished Ink) operation, exhausting to the atmosphere
  (7) one (1) Ink Loading (Resinate) operation, exhausting to the atmosphere,
  (8) one (1) Ink Loading, In (Toluene) operation, exhausting to the atmosphere,
  (9) one (1) Ink Loading, Out (Toluene) operation, exhausting to the atmosphere
  (10) three (3) V series fixed roof dome tanks, identified as PM101 through PM103, each with a maximum capacity of 375 gallons of custom inks and concentrate.

(b) one (1) exterior raw material storage area, installed in 1981, exhausting to the atmosphere and consisting of:
  (1) three (3) V series fixed roof dome tanks, identified as V502 through V504, each with a maximum capacity of 17,000 gallons of toluene; and
  (2) two (2) V series fixed roof dome tanks, identified as V505 and V506, each with a maximum capacity of 30,000 gallons of resinate.

(c) one (1) concentrate surge area, installed in 1981, exhausting to the atmosphere and consisting of:
  (1) three (3) V series fixed roof dome tanks, identified as V151, V160 and V161, each with a maximum capacity of 500 gallons of concentrate;

(d) one (1) intermediate storage area, installed in 1981, exhausting to the atmosphere and consisting of:
  (1) six (6) V series fixed roof dome tanks, identified as V203, V204, V205, V207, V400, and V403 each with a maximum capacity of 10,000 gallons of concentrate;
  (2) two (2) V series fixed roof dome tanks, identified as V208 and V213, each with a maximum capacity of 6,200 gallons of concentrate; and

(e) one (1) finished ink storage area, installed in 1981, exhausting to the atmosphere and consisting of:
  (1) six (6) V series cone bottom fixed roof dome tanks, identified as V401, V402, V404 through V407, each with a maximum capacity of 10,000 gallons of ink.

(f) Loading racks for loading finished product and solvents, with a maximum capacity of 12,000 gallons per hour; and

(g) Building vents (CEF-1 and CEF-2) and dust collector exhaust (F-701) venting indoor VOCs from piping losses and mixing tank losses to the atmosphere.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Prior Approval

There are no new emission units and pollution control equipment receiving prior approval at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour;

(b) Natural draft cooling towers not regulated under a NESHAP;

(c) Paved and unpaved roads and parking lots with public access;

(d) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;

(e) A laboratory as defined in 326 IAC 2-7-1 (20)(C);

(f) Activities or categories not previously identified with emissions less than or equal to insignificant thresholds:
  (1) Handling of pigments, waxes, clays and other dry materials, using a baghouse as particulate control (maximum process weight rate of 14 tons per hour of dry materials).

(g) VOC and HAP storage containers:
  (1) Storage tanks with a capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
  (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(h) Application of oils, greases, lubricants, and other nonvolatile materials applied as temporary protective coatings.

(i) Cleaners and solvents characterized as follows:
  (1) Having a vapor pressure equal to or less than 2kPa, 12mm Hg, or 0.3 psi measured at 38 degrees C (100°F), or
  (2) Having a vapor pressure equal to or less than 0.7 kPa, 5 mm HG, or 0.1 psi measured at 20 degrees C (68°F),

  The use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(j) Closed loop heating and cooling systems.

(k) Any operation using aqueous solutions containing less than 1% by weight VOCs excluding HAPs.

(l) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
(m) Heat exchanger cleaning and repair.
(n) Process vessel degreasing and cleaning to prepare for internal repairs.
(o) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) CP 085-3311-00037, issued on January 25, 1994.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

(a) CP 085-3311-00037, issued on January 25, 1994.

Condition:
Any change or modification which may increase the potential emission to 25 tons per year or more volatile organic compounds from the equipment covered in this letter must be approved by the Office of Air Quality before such change may occur.

Reason not incorporated:
The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7, and the 25 ton per year limit on VOC emissions has been removed.

Enforcement Issue

(a) The source had the potential to emit VOC emissions greater than twenty-five (25) tons per year, exceeding the level in the registration 085-3311-00037, issued on January 25, 1994, requiring approval by the Office of Air Quality before such change may occur. Thus, an enforcement referral is being included with this permit.

(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on November 8, 1996.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document (Appendix A, pages 1 through 4.)

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	less than 100
PM-10	less than 100
SO_2	less than 100
VOC	greater than 100, less than 250
CO	less than 100
NO_x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Toluene	greater than 10
TOTAL	greater than 25

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1996 Source Pollutant Emissions Summary emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.00
PM-10	0.00
SO_2	0.00
VOC	48.07
CO	0.00
NO_x	0.00
HAP (Toluene)	48.07
Total HAPs	48.07

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs*
Clear Ink and Concentrate tanks (V100 and V101)	0.00	0.00	0.00	24.42	0.00	0.00	24.42
Yellow Ink and Concentrate tanks (V102 and V103)	0.00	0.00	0.00	24.42	0.00	0.00	24.42
Red Ink and Concentrate tanks (V104)	0.00	0.00	0.00	24.42	0.00	0.00	24.42
Blue Ink and Concentrate tanks (V105 and V106)	0.00	0.00	0.00	24.42	0.00	0.00	24.42
Ink and Concentrate tanks (V151, V160 and V161, V203, V204, V205 V207, V208 and V213)	0.00	0.00	0.00	18.18	0.00	0.00	18.18
Ink tanks (V400 through V407)	0.00	0.00	0.00	1.52	0.00	0.00	1.52
Toluene tanks (V502 through V504 V505 and V506)	0.00	0.00	0.00	16.60	0.00	0.00	16.60
Ink Loading (Finished Ink)	0.00	0.00	0.00	7.63	0.00	0.00	7.63
Ink Loading (Resinate)	0.00	0.00	0.00	10.64	0.00	0.00	10.64
Ink Loading, In (Toluene)	0.00	0.00	0.00	6.35	0.00	0.00	6.35
Ink Loading, Out (Toluene)	0.00	0.00	0.00	19.05	0.00	0.00	19.05
Insignificant Activities	0.31	0.31	0.02	0.23	3.45	4.10	0.00
Total Emissions	0.31	0.31	0.02	177.88	3.45	4.10	177.65
PSD Significance Levels	250.00	250.00	250.00	250.00	250.00	250.00	N/A

* All HAPs are from Toluene

County Attainment Status

The source is located in Kosciusko County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Kosciusko County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) The source is not subject to the requirements of the New Source Performance Standards, 326 IAC 12, (40 CFR 60.110-112(a), Subpart K), because the fixed roof dome tanks were constructed after May 19, 1978 and have storage capacities less than 40,000 gallons;

(b) The source is not subject to the requirements of the New Source Performance Standards, 326 IAC 12, (40 CFR 60.110-112(a), Subpart Ka), because the fixed roof dome tanks have storage capacities less than 40,000 gallons;

(c) The source is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.112b, Subpart Kb), because the fixed roof dome tanks were constructed or modified prior to the July 23, 1984 applicability date;

(d) This source is not subject to the requirements of the New Source Performance Standards, 326 IAC 12, (40 CFR 60.430-435, Subpart QQ), because this source is a printing ink production plant and does not consist of any packaging rotogravure, publication rotogravure, or flexographic printing operations;

(e) This source is not subject to the requirements of the New Source Performance Standards, 326 IAC 12, (40 CFR 60.110-112(a), Subpart FFF), because this source is a printing ink production plant and does conduct any flexible vinyl and urethane coating or printing operations; and

(f) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), (40 CFR 63.820-839, Subpart KK), as this source does not operate any publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses.

(g) The cleaners and solvents degreaser is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T because it does not use any solvent containing methylene chloride, perchloroethylene, trichloroethyllene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform.

(h) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source is not subject to 326 IAC 2-2 (PSD) as it has the potential to emit any criteria pollutant below 250 tons per 12-month period. Also, controlled PM emissions are below 250 tons per year. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year in Floyd County of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). Although the fixed roof dome tanks (V100-106, V151, V160, V161, V203-205, V207, V208, V213, V400-407, V502-506 and PM 101-103) and the Ink Loading (Finished Ink), Ink Loading (Resinate), Ink Loading, In (Toluene), Ink Loading, Out (Toluene) have a PTE more than 10 tons per year of a single HAP, all of the fixed roof tanks were constructed prior to the July 27, 1997 applicability date. Therefore, the fixed roof dome tanks are not subject to the requirements of 326 IAC 2-4.1.

326 IAC 6-3-2 (Process Operations)

(a) The fixed roof dome tanks located at the source, consisting of: (V100-106, V151, V160, V161, V203-205, V207, V208, V213, V400-407, V502-506 and PM 101-103) are not subject to 326 IAC 6-3-2 (Process Operations), because the fixed roof tanks do not have PM emissions.

(b) The allowable PM emission rate from the handling of pigments, waxes, clays and other dry materials shall not exceed 24.0 pounds per hour.

:

The pounds per hour limitation for the handling of pigments, waxes, clays and other dry materials was calculated with the following equation:

$24.0 = 4.10\ (14.0)^{0.67}$ where E = 24.0 pounds per hour
P = 14.0 tons per hour

The handling of pigments, waxes, clays and other dry materials is in compliance with the requirements of 326 IAC 6-3-2 (Process Operations) when the baghouse is in operation.

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The equipment at this source is not subject to 326 IAC 8-1-6 (New Facilities, General Reduction Requirements) which mandates that a Best Available Control Technology (BACT) analysis be performed for new facilities commencing operations after January 1, 1980 which have potential VOC emissions of 25 tons or more and are not regulated by other provisions of Article 8. Potential VOC emissions from each of the concentrate tanks (V151, V160 and V161, V203, V204, V205 V207, V208 and V213), the ink tanks (V400 through V407) and the toluene tanks (V502 through V504 V505 and V506), custom inks and concentrate (PM101 through PM103), and the Ink Loading (Finished Ink), Ink Loading (Resinate), Ink Loading, In (Toluene), Ink Loading, Out (Toluene) are less than 25 tons/yr.

(a) The total amount of product input to the clear ink and concentrate tanks (V100-V101) shall be limited to 3,083 tons per month such that the potential to emit (PTE) VOC from the manufacture of clear ink and concentrate, shall be limited to less than 25 tons per month. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per twelve (12) consecutive month period.

(b) The total amount of product input to the yellow ink and concentrate tanks (V102-V103) shall be limited to 3,083 tons per month such that the potential to emit (PTE) VOC from the manufacture of yellow ink and concentrate, shall be limited to less than 25 tons per month. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per twelve (12) consecutive month period.

(c) The total amount of product input to the red ink and concentrate tank (V104) shall be limited to 3,083 tons per month such that the potential to emit (PTE) VOC from the manufacture of red ink and concentrate, shall be limited to less than 25 tons per month. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per twelve (12) consecutive month period.

(d) The total amount of product input to the blue ink and concentrate tanks (V105-V106) shall be limited to 3,083 tons per month such that the potential to emit (PTE) VOC from the manufacture of blue ink and concentrate, shall be limited to less than 25 tons per month. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per twelve (12) consecutive month period.

The usage limit for tanks V100 through V106 shall be based upon the following:

(1) (total amount of product input) x (emission factor in pounds VOC per pound of product manufactured) = (potential to emit (PTE) VOC)
(2) an emission factor of 0.00066 pounds VOC per pound of product manufactured;
(3) any other factor determined in a stack test approved by OAQ.

Compliance with these limits makes 326 IAC 8-1-6 not applicable.

326 IAC 8-3 (Organic Solvent Degreasing Operation)

The cleaner and solvent operations were constructed prior to July 1, 1990, therefore 326 IAC 8-3 (Organic Solvent Degreasing Operation) does not apply.

326 IAC 8-4 (Petroleum Sources)

This source is not subject to this rule as this source is not one of the types listed under 326 IAC 8-4 (petroleum refineries, petroleum liquid storage facilities, bulk gasoline, terminals, bulk gasoline plants, gasoline dispensing facilities, gasoline transports).

326 IAC 8-5-5 (Graphic Arts Operations)

This source is not subject to the requirements of 326 IAC 8-5-5 (Graphic Arts Operations), because this source is a printing ink production plant and does not consist of any packaging rotogravure, publication rotogravure, or flexographic printing operations.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source was constructed after January 1, 1980, therefore, this rule does not apply.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

This source is not subject to the requirements of 326 IAC 8-7, because there are no coating operations at this source.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The source is not subject to the requirements of 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels) because this source is not located in one of the listed counties (Clark, Floyd, Lake or Porter Counties).

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

(a) Daily visible emission notations of the handling of pigments, waxes, clays and other dry materials baghouse stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(b) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the handling of pigments, waxes, clays and other dry materials, at least once once per shift when the handling of pigments, waxes, clays and other dry materials is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) An inspection shall be performed each calender quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

(d) In the event that bag failure has been observed for multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.

These monitoring conditions are necessary because the baghouse for the handling of pigments, waxes, clays and other dry materials must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Quality (OAQ) Part 70 Application Form GSD-08.

(a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.

(b) See attached calculations for detailed air toxic calculations. (Appendix A, pages 1 through 4)

Conclusion

The operation of this printing ink production plant shall be subject to the conditions of the attached proposed **Part 70 Permit No. T085-7115-00037.**

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a Part 70 Operating Permit

Source Name:	Flint Ink North America Corporation
Source Location:	3025 West Old Road 30, Warsaw, IN, 46580-0287
County:	Kosciusko
Construction Permit No.:	T085-7115-00037
SIC Code:	2893
Permit Reviewer:	Phillip Ritz/EVP

On March 12, 2001, the Office of Air Quality (OAQ) had a notice published in the Times Union, Warsaw, Indiana, stating that Flint Ink North America Corporation had applied for a Part 70 Operating Permit to construct and operate a printing ink production plant. The notice also stated that OAQ proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following changes to the Part 70 Operating Permit:

(a) Condition D.1.1 of the permit has been modified to restate the product input limit as a tons per twelve (12) consecutive months period format (74,000,000 pounds product input/year / 2000 pounds/ton = 37,000 tons per year). The changes to the permit are as follows:

D.1.1 General Volatile Organic Compound Reduction Requirements [326 IAC 8-1-6]

(a) The total amount of product input to the clear ink and concentrate tanks (V100-V101) shall be limited to ~~3,083~~ **37,000** tons per **twelve (12) consecutive** month**s** such that the potential to emit (PTE) VOC from the manufacture of clear ink and concentrate, shall be limited to less than 25 tons per **twelve (12) consecutive** month**s**. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per twelve (12) consecutive month period.

(b) The total amount of product input to the yellow ink and concentrate tanks (V102-V103) shall be limited to ~~3,083~~ **37,000** tons per **twelve (12) consecutive** month**s** such that the potential to emit (PTE) VOC from the manufacture of yellow ink and concentrate, shall be limited to less than 25 tons per **twelve (12) consecutive** month**s**. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per twelve (12) consecutive month period.

(c) The total amount of product input to the red ink and concentrate tank (V104) shall be limited to ~~3,083~~ **37,000** tons per **twelve (12) consecutive** month**s** such that the potential to emit (PTE) VOC from the manufacture of red ink and concentrate, shall be limited to less than 25 tons per **twelve (12) consecutive** month**s**. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per twelve (12) consecutive month period.

(d) The total amount of product input to the blue ink and concentrate tanks (V105-V106) shall be limited to ~~3,083~~ **37,000** tons per **twelve (12) consecutive** month**s** such that the potential to emit (PTE) VOC from the manufacture of blue ink and concentrate, shall be limited to less than 25 tons per **twelve (12) consecutive** month**s**. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per twelve (12) consecutive month period.

The usage limit for tanks V100 through V106 shall be based upon the following:
(1) (total amount of product input) x (emission factor in pounds VOC per pound of product manufactured) = (potential to emit (PTE) VOC)
(2) an emission factor of 0.00066 pounds VOC per pound of product manufactured;
(3) any other factor determined in a stack test approved by OAQ.

Compliance with these limits makes 326 IAC 8-1-6 not applicable.

(b) Condition D.1.3 has been modified to remove the HAP testing requirement as testing is only required for VOCs:

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this permit, in order to verify the emission factor used to determine the production limit in Condition D.1.1, the Permittee shall perform VOC ~~and HAP~~ testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

(c) The limits contained in the Part 70 Quarterly Reports have been modified to match the reworded product input limits. The changes to the permit are as follows:

Limit: The total amount of product input to the clear ink and concentrate tanks (V100-V101) shall be limited to ~~3,083~~ **37,000** tons per **twelve (12) consecutive** month**s** such that the potential to emit (PTE) VOC from the manufacture of clear ink and concentrate, shall be limited to less than 25 tons per **twelve (12) consecutive** month**s**. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per twelve (12) consecutive month period.

Limit: The total amount of product input to the yellow ink and concentrate tanks (V102-V103) shall be limited to ~~3,083~~ **37,000** tons per **twelve (12) consecutive** month**s** such that the potential to emit (PTE) VOC from the manufacture of yellow ink and concentrate, shall be limited to less than 25 tons per **twelve (12) consecutive** month**s**. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per twelve (12) consecutive month period.

Limit: The total amount of product input to the red ink and concentrate tank (V104) shall be limited to ~~3,083~~ **37,000** tons per **twelve (12) consecutive** month**s** such that the potential to emit (PTE) VOC from the manufacture of red ink and concentrate, shall be limited to less than 25 tons per **twelve (12) consecutive** month**s**. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per twelve (12) consecutive month period.

Limit: The total amount of product input to the blue ink and concentrate tanks (V105-V106) shall be limited to ~~3,083~~ **37,000** tons per **twelve (12) consecutive** month**s** such that the potential to emit (PTE) VOC from the manufacture of blue ink and concentrate, shall be limited to less than 25 tons per **twelve (12) consecutive** month**s**. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per twelve (12) consecutive month period.

The following revisions have been made to the Technical Support Document under Compliance Requirements (**bolded** language has been added, the language with a ~~line~~ through it has been deleted). The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

(d) The federal rule applicability section on page 6 of 10 of the TSD has been revised to list the specific rule citation for Subpart T. The changes to the TSD are as follows:

(g) The cleaners and solvents degreaser is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), **(40 CFR 63.460,** Subpart T**)** because it does not use any solvent containing methylene chloride, perchloroethylene, trichloroethyllene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform.

(e) Page 6 of 10 of the TSD has been revised to include 40 CFR 52.21 as one of the non-applicable regulations.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source is not subject to 326 IAC 2-2 (PSD)**, and 40 CFR 52.21** as it has the potential to emit any criteria pollutant below 250 tons per 12-month period. Also, controlled PM emissions are below 250 tons per year. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

(f) Page 7 of 10 of the TSD has been revised to state that the trigger level for any single HAP is 10 tpy and to add the loading racks to the list of emission units that are not subject to the requirements of this rule.

326 IAC 2-4.1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any **single** HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). Although the fixed roof dome tanks (V100-106, V151, V160, V161, V203-205, V207, V208, V213, V400-407, V502-506 and PM 101-103) and the Ink Loading (Finished Ink), Ink Loading (Resinate), Ink Loading, In (Toluene), Ink Loading, Out (Toluene) **and the Loading racks for loading finished product and solvents** have a PTE more than 10 tons per year of a single HAP, all of the fixed roof tanks **and other units** were constructed prior to the July 27, 1997 applicability date. Therefore, the fixed roof dome tanks are not subject to the requirements of 326 IAC 2-4.1.

(g) Page 7 of 10 of the TSD has been revised as follows to state that the baghouse must be in operation at all times that the controlled emission units are in operation:

326 IAC 6-3-2 (Process Operations)

(a) The fixed roof dome tanks located at the source, consisting of: (V100-106, V151, V160, V161, V203-205, V207, V208, V213, V400-407, V502-506 and PM 101-103) are not subject to 326 IAC 6-3-2 (Process Operations), because the fixed roof tanks do not have PM emissions.

(b) The allowable PM emission rate from the handling of pigments, waxes, clays and other dry materials shall not exceed 24.0 pounds per hour.

The pounds per hour limitation for the handling of pigments, waxes, clays and other dry materials was calculated with the following equation:

$24.0 = 4.10\ (14.0)^{0.67}$ where E = 24.0 pounds per hour
P = 14.0 tons per hour

The **baghouse for PM control shall be in operation and control emissions from the** handling of pigments, waxes, clays and other dry materials **at all times that the handling of pigments, waxes, clays and other dry materials are** ~~is in compliance with the requirements of 326 IAC 6-3-2 (Process Operations) when the baghouse is~~ in operation.

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

(h) Page 8 of 10 of the TSD has been revised to restate the product input limit as a ton per twelve (12) consecutive months period format (74,000,000 pounds / 2000pounds/ton = 37,000 tons per year):

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The equipment at this source is not subject to 326 IAC 8-1-6 (New Facilities, General Reduction Requirements) which mandates that a Best Available Control Technology (BACT) analysis be performed for new facilities commencing operations after January 1, 1980 which have potential VOC emissions of 25 tons or more and are not regulated by other provisions of Article 8. Potential VOC emissions from each of the concentrate tanks (V151, V160 and V161, V203, V204, V205 V207, V208 and V213), the ink tanks (V400 through V407) and the toluene tanks (V502 through V504 V505 and V506), custom inks and concentrate (PM101 through PM103), and the Ink Loading (Finished Ink), Ink Loading (Resinate), Ink Loading, In (Toluene), Ink Loading, Out (Toluene) are less than 25 tons/yr.

(a) The total amount of product input to the clear ink and concentrate tanks (V100-V101) shall be limited to ~~3,083~~ **37,000** tons per **twelve (12) consecutive** month**s** such that the potential to emit (PTE) VOC from the manufacture of clear ink and concentrate, shall be limited to less than 25 tons per **twelve (12) consecutive** month**s**. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per twelve (12) consecutive month period.

(b) The total amount of product input to the yellow ink and concentrate tanks (V102-V103) shall be limited to ~~3,083~~ **37,000** tons per **twelve (12) consecutive** month**s** such that the potential to emit (PTE) VOC from the manufacture of yellow ink and concentrate, shall be limited to less than 25 tons per **twelve (12) consecutive** month**s**. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per twelve (12) consecutive month period.

(c) The total amount of product input to the red ink and concentrate tank (V104) shall be limited to ~~3,083~~ **37,000** tons per **twelve (12) consecutive** month**s** such that the potential

to emit (PTE) VOC from the manufacture of red ink and concentrate, shall be limited to less than 25 tons per **twelve (12) consecutive** month**s**. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per twelve (12) consecutive month period.

(d) The total amount of product input to the blue ink and concentrate tanks (V105-V106) shall be limited to ~~3,083~~ **37,000** tons per **twelve (12) consecutive** month**s** such that the potential to emit (PTE) VOC from the manufacture of blue ink and concentrate, shall be limited to less than 25 tons per **twelve (12) consecutive** month**s**. This usage limit is required to limit the potential to emit of VOC to less than 25 tons per twelve (12) consecutive month period.

The usage limit for tanks V100 through V106 shall be based upon the following:
(1) (total amount of product input) x (emission factor in pounds VOC per pound of product manufactured) = (potential to emit (PTE) VOC)
(2) an emission factor of 0.00066 pounds VOC per pound of product manufactured;
(3) any other factor determined in a stack test approved by OAQ.

Compliance with these limits makes 326 IAC 8-1-6 not applicable.

(i) The TSD already discusses HAPs on page 7 of 10 under 326 IAC 2-4.1 applicability, therefore the air toxics emission paragraphs has been deleted rom the TSD as follows:

~~**Air Toxic Emissions**~~

~~Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Quality (OAQ) Part 70 Application Form GSD-08.~~

~~(a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.~~

~~(b) See attached calculations for detailed air toxic calculations. (Appendix A, pages 1 through 4)~~

Appendix A: Emission Calculations

Company Name: Flint Ink Corporation
Address City IN Zip: 3025 West Old Road 30, Warsaw, IN, 46580-0287
Title V: T085-7115-00037
Reviewer: Phillip Ritz/EVP
Date: December 15, 1998

Uncontrolled Potential Emissions (tons/year)

	Emissions Generating Activity									
Pollutant	Natural Gas Combustion	Tanks (V502 - V506)	V100+101 Piping and Baghouse Exhaust	V102+103 Piping and Baghouse Exhaust	V104 Piping and Baghouse Exhaust	V105+106 Piping and Baghouse Exhaust	V151, V160 and V161, V203, V204, V205 V207, V208 and V213 Piping and Baghouse Exhaust	(V400) Pre-MIx Roof, Piping and Baghouse Exhaust	Ink Loading	**TOTAL**
PM	0.31	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.31
PM10	0.31	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.31
SO2	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02
NOx	4.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	4.10
VOC	0.23	16.60	24.42	24.42	24.42	24.42	18.18	1.52	43.67	177.88
CO	3.45	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.45
total HAPs	0.00	16.60	24.42	24.42	24.42	24.42	18.18	1.52	43.67	177.65
worst case single HAP	0.00	16.60 (toluene)	24.42 (toluene)	24.42 (toluene)	24.42 (toluene)	24.42 (toluene)	18.18 (toluene)	102.46 (toluene)	43.67 (toluene)	177.65 (toluene)

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions (tons/year)

	Emissions Generating Activity									
Pollutant	Natural Gas Combustion	Tanks (V502 - V506)	V100+101 Piping and Baghouse Exhaust	V102+103 Piping and Baghouse Exhaust	V104 Piping and Baghouse Exhaust	V105+106 Piping and Baghouse Exhaust	V151, V160 and V161, V203, V204, V205 V207, V208 and V213 Piping and Baghouse Exhaust	(V400) Pre-MIx Roof, Piping and Baghouse Exhaust	Ink Loading	**TOTAL**
PM	0.31	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.31
PM10	0.31	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.31
SO2	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02
NOx	4.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	4.10
VOC	0.23	16.60	24.42	24.42	24.42	24.42	18.18	1.52	43.67	177.88
CO	3.45	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.45
total HAPs	0.00	16.60	24.42	24.42	24.42	24.42	18.18	1.52	43.67	177.65
worst case single HAP	0.00	16.60 (toluene)	24.42 (toluene)	24.42 (toluene)	24.42 (toluene)	24.42 (toluene)	18.18 (toluene)	102.46 (toluene)	43.67 (toluene)	177.65 (toluene)

Appendix A: Emission Calculations

Company Name: Flint Ink Corporation
Address City IN Zip: 3025 West Old Road 30, Warsaw, IN, 46580-0287
Title V: T085-7115-00037
Reviewer: Phillip Ritz/EVP
Date: December 15, 1998

Data for Tank Calculations (losses)

	(V502, 503, 504)		(V505, 506)	
	Breathing	Working	Breathing	Working
Diameter (ft)	12.00	12.00	12.00	12.00
Height (ft)	20.50	20.50	35.00	35.00
Mw	96.15	96.15	96.15	96.15
Ps (psia)	14.70	14.70	14.70	14.70
Tank capacity (gal)	17,300.00	17,300.00	30,000.00	30,000.00
C	0.63	na	0.63	na
Fp	1.40	na	1.40	na
Kc	1.00	1.00	1.00	1.00
Delta T (F)	18.00	na	18.00	na
Kn	na	0.22	na	0.22
Temp. (F)	68.00	68.00	140.00	140.00
VP (psia)	0.43	0.43	2.51	2.51

PTE

V502 -504, Toluene	0.27	1.92			2.19
V505, V506, Resinate			1.32	13.09	14.41
Total (tpy)					**16.60**

Methodology:
(1) Average daily high maximum temp. = 58.5 F
(2)Average daily low minimum temp. = 40.5 F
(3) Densities - lbs/ gal:
Toluene 7.25
Resinate 8.40
Ink 8.40

Appendix A: Emission Calculations

Company Name: Flint Ink Corporation
Address City IN Zip: 3025 West Old Road 30, Warsaw, IN, 46580-0287
Title V: T085-7115-00037
Reviewer: Phillip Ritz/EVP
Date: December 15, 1998

Emission Point	Emission Factor (VOC/lb product)	Maximum Production (lb product)	PTE (TPY)
V100+101	6.60E-04	74,000,000.00	24.42
V102+103	6.60E-04	74,000,000.00	24.42
V104	6.60E-04	74,000,000.00	24.42
V105+106	6.60E-04	74,000,000.00	24.42
V151, V160 and V161, V203, V204, V205 V207, V208 and V213	6.60E-04	55,100,000.00	18.18
		Subtotal	**115.86**
V400: roof exhaust	3.91E-06	218,000,000.00	0.43
V400: piping	1.00E-05	218,000,000.00	1.09
		Subtotal	**1.52**
Loading, Out, Finished Ink	1.40E-04	109,000,000.00	7.63
Loading, In, Resinate	1.40E-04	152,000,000.00	10.64
Loading, In, Toluene	2.33E-04	54,500,000.00	6.35
Loading, Out, Toluene	2.33E-04	163,500,000.00	19.05
		Subtotal	**43.67**

	See Tank Calculations	Maximum Throughput (lbs)	PTE (tpy)
V502, V503, V504 Reuse Toluene		130,000,000.00	2.19
V505, V506 Resinate		152,000,000.00	14.41
		Subtotal	**16.60**
		Grand Total	**177.65**

emission factor is a combination of the Baghouse VOC emission (BHE) and and the total emission factor for the mixing tanks is 0.00066 lb VOC/ lb product.

Appendix A: Emission Calculations
Natural Gas Combustion
MM Btu/hr 0.3 - < 100

Company Name: Flint Ink Corporation
Address City IN Zip: 3025 West Old Road 30, Warsaw, IN, 46580-0287
Title V: T085-7115-00037
Reviewer: Phillip Ritz/EVP
Date: December 15, 1998

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
9.4	82.1

Heat Input Capacity includes:
one (1) space heater with a rated heat input of 1.71 mmBtu per hour
one (1) space heater with a rated heat input of 0.65mmBtu per hour
two (2) space heater each with a rated heat input of 0.15 mmBtu per hour (0.30 mmBtu total)
one (1) space heater with a rated heat input of 0.412 mmBtu per hour
one (1) 6.3 mmBtu/hr boiler

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0	5.5	84.0
Potential Emission in tons/yr	0.31	0.31	0.02	4.10	0.23	3.45

Methodology:
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 50, Flue gas recirculation = 32
All PM is assumed to be less than 1.0 micrometer in diameter. Therefore, the PM emission factors may be used to estimate PM10, PM2.5, and PM1 em
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1 and 1.4-2, SCC #1-01-006-02, #1-02-006-02, #1-03-006-02, #1-03-006-03
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton